



South Coast Air Quality Management District

Engineering & Compliance

*Policies &
Procedures*

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

MEMORANDUM

DATE: June 16, 1981
TO: Permit Services Division Managers
FROM: Sanford M. Weiss, Director of Permit Services /s/ SMW
SUBJECT: New Source Review and Change of Location

You will remember during our meeting of June 11, 1981, we discussed the change of location provisions of Regulation XIII. I believe that we are in agreement that a change of location which is greater than 5 miles away from the original site requires review under Regulation XIII. Similarly, a change of location which results in emission increases greater than 150 lbs/day is also subject to NSR. We also agreed that "bubbling" between the old and the new location is inappropriate. We were not certain whether the remaining situations are flatly excused or exempt under Rule 1304.

I have consulted with Curt Coleman on this matter. While the intent of Regulation XIII is relatively clear, there seems to be something illogical about the change of location situation. Accordingly, he and I are of the opinion that the most effective procedure is to apply Regulation XIII to those situations called out in Rule 1303(c) and flatly excuse from Regulation XIII all other change of location situations. That means that there is no need to require BACT or to advertise for the non-applicable situations. Lastly, we believe that the change of location situations must be cleared up in revisions to Regulation XIII

SMW:llm

pc: Curt Coleman